



Keystone Consolidated Industries, Inc.
Keystone Steel & Wire – Peoria, Illinois
Keystone Wire Products – Sherman, Texas
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www.redbrand.com • www.keystonesteel.com

US EPA RECORDS CENTER REGION 5



July 14, 2009

CERTIFIED MAIL #7004 1160 0000 0265 4655
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending June 30, 2009 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 2nd Quarter 2009

- Keystone submitted a Quarterly Progress Report to U.S. EPA on April 10, 2009.

Corrective Measures Activities Implemented During 2nd Quarter 2009

- No activities implemented during 2nd Quarter 2009

Corrective Measures Activities Scheduled for 3rd Quarter 2009

- A letter will be submitted to Illinois EPA requesting approval of the ELUCs for F-Pond and North Ditch Staging Area which summarizes the remedial activities of the project and a description why ELUCs are necessary.

Mr. Jonathan Adenuga
July 14, 2009
Page 2

Corrective Measures Project Schedule

- A letter will be submitted to Illinois EPA requesting approval of the ELUCs for F-Pond and North Ditch Staging Area which summarizes the remedial activities of the project and a description why ELUCs are necessary.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report Revision 1*.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis



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April 10, 2009

CERTIFIED MAIL #7004 1160 0000 0265 4518
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2009 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 1st Quarter 2009

- Keystone submitted a Quarterly Progress Report to U.S. EPA on January 12, 2009.

Corrective Measures Activities Implemented During 1st Quarter 2009

- The F-Pond and North Ditch Staging Area monitoring wells were abandoned and plugged on February 4, 2009.

Corrective Measures Activities Scheduled for 2nd Quarter 2009

- A letter will be submitted to Illinois EPA requesting approval of the ELUCs for F-Pond and North Ditch Staging Area which summarizes the remedial activities of the project and a description why ELUCs are necessary.

Mr. Jonathan Adenuga
April 10, 2009
Page 2

Corrective Measures Project Schedule

- A letter will be submitted to Illinois EPA requesting approval of the ELUCs for F-Pond and North Ditch Staging Area which summarizes the remedial activities of the project and a description why ELUCs are necessary.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report Revision 1*.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
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January 12, 2009

CERTIFIED MAIL #7004 2510 0002 6347 6582
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2008 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 4th Quarter 2008

- Keystone submitted a Quarterly Progress Report to U.S. EPA on October 14, 2008.
- Keystone submitted the *Corrective Measures Completion Report Revision 1* to U.S. EPA on December 19, 2008.

Corrective Measures Activities Implemented During 4th Quarter 2008

- No corrective measure activities were implemented during this quarter.

Corrective Measures Activities Scheduled for 1st Quarter 2009

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned.

Corrective Measures Project Schedule

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned during the first quarter of 2009.

Mr. Jonathan Adenuga
January 12, 2009
Page 2

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report Revision 1*.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
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October 14, 2008

CERTIFIED MAIL # 7004 2510 0002 6347 6544
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2008 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 3rd Quarter 2008

- Keystone submitted a letter to the Illinois EPA and copied U.S. EPA on the filing of the environmental land use controls (ELUC) for the South Ditch and Lower South Ditch on July 1, 2008.
- Keystone submitted a Quarterly Progress Report to U.S. EPA on July 14, 2008.

Corrective Measures Activities Implemented During 3rd Quarter 2008

- No corrective measure activities were implemented during this quarter.

Corrective Measures Activities Scheduled for 4th Quarter 2008

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned pending U.S. EPA approval.
- A revised Corrective Measures Completion Report will be submitted pending U.S. EPA's response to ENTACT's June 30, 2008 letter.

Mr. Jonathan Adenuga
October 14, 2008
Page 2

Corrective Measures Project Schedule

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned.
- A revised Corrective Measures Completion Report will be submitted pending U.S. EPA's response to ENTACT's June 30, 2008 letter.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results have been submitted in several letter reports dated September 8, 2006; February 5, 2007; May 1, 2007; July 13, 2007; January 14, 2008; April 15, 2008; and June 17, 2008.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
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Russ Perry, on behalf of Keystone Consolidated Industries
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July 14, 2008

CERTIFIED MAIL #7004 2510 0002 6347 6391
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Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending June 30, 2008 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 2nd Quarter 2008

- Keystone submitted a Quarterly Progress Report to U.S. EPA on April 14, 2008.
- ENTACT submitted a letter report to U.S. EPA on April 15, 2008 regarding the results of the February 5, 2008 quarterly groundwater monitoring event.
- ENTACT submitted a letter report to U.S. EPA on June 17, 2008 regarding the results of the April 29, 2008 quarterly groundwater monitoring event.
- Keystone filed Environmental Land Use Control's for Land Parcel ID Numbers 17-25-276-002 and 17-36-400-003 with Peoria County Recorder of Deeds on June 27, 2008.
- ENTACT submitted a letter to U.S. EPA on June 30, 2008 regarding U.S. EPA's May 22, 2008 letter. This letter also included revised responses to U.S. EPA's September 26, 2006 comments regarding the *Corrective Measures Completion Report*.

Corrective Measures Activities Implemented During 2nd Quarter 2008

- Groundwater monitoring of the F-Pond monitoring wells was conducted on April 29, 2008.

Mr. Jonathan Adenuga
July 14, 2008
Page 2

Corrective Measures Activities Scheduled for 3rd Quarter 2008

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned.
- A revised Corrective Measures Completion Report will be submitted pending U.S. EPA's response to ENTACT's June 30, 2008 letter.

Corrective Measures Project Schedule

- The F-Pond and North Ditch Staging Area monitoring wells will be plugged and abandoned.
- A revised Corrective Measures Completion Report will be submitted pending U.S. EPA's response to ENTACT's June 30, 2008 letter.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results have been submitted in several letter reports dated September 8, 2006; February 5, 2007; May 1, 2007; July 13, 2007; January 14, 2008; April 15, 2008; and June 17, 2008.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
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April 14, 2008

CERTIFIED MAIL # 7004 2510 0002 6347 6193
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2008 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 1st Quarter 2008

- Keystone submitted a Quarterly Progress Report to U.S. EPA on January 10, 2008
- ENTACT submitted a letter report to U.S. EPA on January 14, 2008 regarding the results of the July 19, 2007, August 2, 2007 and October 31, 2007 quarterly groundwater monitoring events.

Corrective Measures Activities Implemented During 1st Quarter 2008

- Groundwater monitoring of the F-Pond monitoring wells was conducted on February 5, 2008.

Corrective Measures Activities Scheduled for 2nd Quarter 2008

- The groundwater monitoring results for the samples collected on February 5, 2008 will be submitted to U.S. EPA for review.
- The F-Pond monitoring wells will be sampled in early May 2008.

Mr. Jonathan Adenuga
April 14, 2008
Page 2

- The groundwater monitoring results for the samples to be collected in early May 2008 will be submitted to U.S. EPA for review.

Corrective Measures Project Schedule

- A letter report which summarizes the results of the February 5, 2008 sampling event will be submitted to U.S. EPA.
- The F-Pond monitoring wells will be sampled in early May 2008 and a letter report summarizing the results will be submitted to U.S. EPA for review.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the February 5, 2008 monitoring event will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
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Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis



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January 10, 2008

CERTIFIED MAIL # 7004 2510 0002 6347 6018
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company ("Keystone") at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2007 regarding the requirements of the Administrative Order on Consent ("AOC") between Keystone and U.S. Environmental Protection Agency ("U.S. EPA") Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 4th Quarter 2007

- Keystone submitted a Quarterly Progress Report to U.S. EPA on October 15, 2007.

Corrective Measures Activities Implemented During 4th Quarter 2007

- Groundwater monitoring of the F-Pond monitoring wells was conducted on October 31, 2007.

Corrective Measures Activities Scheduled for 1st Quarter 2008

- The groundwater monitoring results for the samples collected from monitoring well FP-3 on July 19, 2007; from the F-Pond and North Ditch Staging Area monitoring wells on August 2, 2007; and from the F-Pond monitoring wells on October 31, 2007 will be submitted to U.S. EPA for review.
- The F-Pond monitoring wells will be sampled in late January 2008.

Mr. Jonathan Adenuga
January 10, 2008
Page 2

Corrective Measures Project Schedule

- A letter report which summarizes the results of the July 19, 2007, August 2, 2007 and October 31, 2007 sampling events will be submitted to U.S. EPA.
- The F-Pond monitoring wells will be sampled in late January 2008 and a letter report summarizing the results will be submitted to U.S. EPA for review.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the July 19, 2007, August 2, 2007 and October 31, 2007 monitoring events will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
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October 15, 2007

CERTIFIED MAIL #7004 2510 0002 6347 5745
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
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Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2007 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 3rd Quarter 2007

- Keystone submitted a Quarterly Progress Report to U.S. EPA on July 13, 2007.
- ENTACT submitted a letter report to U.S. EPA on July 13, 2007 regarding the results of the April 2007 quarterly groundwater monitoring event.

Corrective Measures Activities Implemented During 3rd Quarter 2007

- Groundwater monitoring well TL4-R at the F-Pond was plugged and abandoned on July 18, 2007. The new groundwater monitoring well, FP-3, was installed on July 18, 2007 and developed and sampled on July 19, 2007.

Corrective Measures Activities Scheduled for 4th Quarter 2007

- The groundwater monitoring results for groundwater monitoring well FP-3 will be submitted to U.S. EPA for review.

Mr. Jonathan Adenuga
October 15, 2007
Page 2

Corrective Measures Project Schedule

- A letter report which summarizes the results of the FP-3 groundwater monitoring event will be submitted to U.S. EPA.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the FP-3 groundwater monitoring event will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

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July 13, 2007

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Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending June 30, 2007 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 2nd Quarter 2007

- Keystone submitted a Quarterly Progress Report to U.S. EPA on April 11, 2007.
- ENTACT submitted a letter report to U.S. EPA on May 1, 2007 regarding the results of the January 2007 quarterly groundwater monitoring event and the response to U.S. EPA's April 17, 2007 comments regarding ENTACT's February 5, 2007 letter.

Corrective Measures Activities Implemented During 2nd Quarter 2007

- The fourth quarterly groundwater monitoring event was completed on April 25, 2007.

Corrective Measures Activities Scheduled for 3rd Quarter 2007

- The fourth quarterly groundwater monitoring event results will be submitted to U.S. EPA for review.
- Groundwater monitoring well TL4-R will be plugged and abandoned in late July 2007 and the new groundwater monitoring well at the F-Pond will be installed, developed and sampled in late July 2007. The results will be submitted to U.S. EPA for review.

Mr. Jonathan Adenuga
July 13, 2007
Page 2

Corrective Measures Project Schedule

- A letter report which summarizes the results of the fourth quarterly groundwater monitoring event will be submitted to U.S. EPA.
- A letter report which summarizes the results of the July groundwater monitoring event for the TL-4R replacement well at F-Pond will be submitted to U.S. EPA.

CMI Workplan Modifications

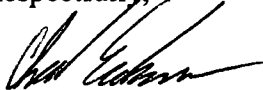
- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the fourth quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.
- Groundwater monitoring results for the July groundwater monitoring event for the TL-4R replacement well at F-Pond will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
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April 11, 2007

CERTIFIED MAIL #7004 2510 0002 6347 5271
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Mr. Jonathan Adenuga
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Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2007 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 1st Quarter 2007

- Keystone submitted a Quarterly Progress Report to U.S. EPA on January 12, 2007.
- ENTACT submitted a letter report to U.S. EPA on February 5, 2007 regarding the results of the October 2006 quarterly groundwater monitoring event.
- Keystone submitted the Notice of Termination for coverage under the General Permit for Storm Water Discharges Associated with Construction Site Activities to the IEPA Division of Water Pollution Control on March 30, 2007.

Corrective Measures Activities Implemented During 1st Quarter 2007

- The third quarterly groundwater monitoring event was completed on January 17, 2007.

Corrective Measures Activities Scheduled for 2nd Quarter 2007

- The third quarterly groundwater monitoring event results will be submitted to U.S. EPA for review.
- The fourth quarterly groundwater monitoring event will be performed in late April 2007. The results will be submitted to U.S. EPA for review.

Mr. Jonathan Adenuga
April 11, 2007
Page 2

Corrective Measures Project Schedule

- A letter report which summarizes the results of the third quarterly groundwater monitoring event will be submitted to U.S. EPA.
- A letter report which summarizes the results of the fourth quarterly groundwater monitoring event will be submitted to U.S. EPA.

CMI Workplan Modifications

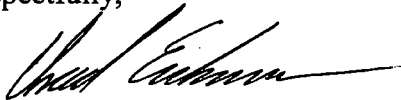
- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the third quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.
- Groundwater monitoring results for the fourth quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis



Keystone Consolidated Industries, Inc.
Keystone Steel & Wire – Peoria, Illinois
Keystone Wire Products – Sherman, Texas
701 S.W. Adams Street • Peoria, IL 61641
309/697-7020 Phone • 309/697-7487 Fax
www.redbrand.com • www.keystonesteel.com

January 12, 2007

CERTIFIED MAIL # 7004 2510 0002 6347 5097
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2006 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 4th Quarter 2006

- Keystone submitted a Quarterly Progress Report to U.S. EPA on October 12, 2006.
- ENTACT submitted a letter to U.S. EPA on October 25, 2006 regarding ENTACT's response to U.S. EPA's comments regarding the *Corrective Measures Completion Report*.

Corrective Measures Activities Implemented During 4th Quarter 2006

- The second quarterly groundwater monitoring event was completed on October 6, 2006.

Corrective Measures Activities Scheduled for 1st Quarter 2007

- The second quarterly groundwater monitoring event results will be submitted to U.S. EPA for review.
- The third quarterly groundwater monitoring event will be performed in late January 2007. The results will be submitted to U.S. EPA for review.

Mr. Jonathan Adenuga
January 12, 2007
Page 2

Corrective Measures Project Schedule

- A letter report which summarizes the results of the second quarterly groundwater monitoring event will be submitted to U.S. EPA in mid-January 2007.
- A letter report which summarizes the results of the third quarterly groundwater monitoring event will be submitted to U.S. EPA in March 2007.

CMI Workplan Modifications

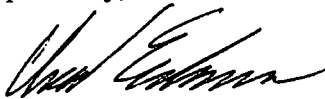
- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the second quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.
- Groundwater monitoring results for the third quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis



Keystone Consolidated Industries, Inc.
Keystone Steel & Wire – Peoria, Illinois
Keystone Wire Products – Sherman, Texas
100 S.W. Adams Street • Peoria, IL 61641
309-697-7020 Phone • 309/697-7487 Fax
www.redbrand.com • www.keystonesteel.com

October 12, 2006

CERTIFIED MAIL #7004 2510 0002 6346 2400
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent
Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2006 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 3rd Quarter 2006

- Keystone submitted a Quarterly Progress Report to U.S. EPA on July 11, 2006.
- Keystone submitted the *Corrective Measures Completion Report* to U.S. EPA on July 31, 2006.
- Keystone submitted a letter to U.S. EPA on August 17, 2006 regarding the draft environmental land use controls for the F-Pond and North Ditch Staging Area.
- ENTACT submitted the *Addendum to the Corrective Measures Completion Report* to U.S. EPA on September 8, 2006.
- ENTACT submitted a letter report to U.S. EPA on September 21, 2006 regarding the May 2006 groundwater monitoring results.

Corrective Measures Activities Implemented During 3rd Quarter 2006

- The first quarterly groundwater monitoring event was completed on July 13, 2006.

Corrective Measures Activities Scheduled for 4th Quarter 2006

- ENTACT will address U.S. EPA's comments to the *Corrective Measures Completion Report* and will submit a revision to U.S. EPA for approval.

Mr. Jonathan Adenuga
October 12, 2006
Page 2

- The second quarterly groundwater monitoring event will be performed on October 5, 2006. The results will be submitted to U.S. EPA for review.

Corrective Measures Project Schedule

- A response to U.S. EPA's comments regarding the *Corrective Measures Completion Report* and the associated revision to the report will be submitted to U.S. EPA by October 28, 2006.
- A letter report which summarizes the results of the second quarterly groundwater monitoring event will be submitted to U.S. EPA in mid-November 2006.

CMI Workplan Modifications

- The corrective measures activities were completed in accordance with the *Corrective Measures Implementation Workplan, Revision 2*.

Analytical Data

- All of the analytical data generated during the corrective measures was submitted to U.S. EPA in the *Corrective Measures Completion Report*.
- Groundwater monitoring results for the second quarterly groundwater monitoring event will be submitted to U.S. EPA in a letter report.

Additionally during this quarter, ENTACT completed and submitted the *Remedial Action Report for the South Ditch, South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area* to IEPA for review and approval on July 31, 2006. A letter report which contained the draft language for the environmental land use controls for the South Ditch, South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area was also submitted to IEPA for review and approval on August 17, 2006.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

Mr. Jonathan Adenuga
October 12, 2006
Page 3

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis

April 3, 2006

CERTIFIED MAIL #7004 2510 0002 6414 7092
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2006 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000. The following paragraphs describe these activities.

Documents Completed and Submitted During 1st Quarter 2006

- Keystone submitted a Quarterly Progress Report to U.S. EPA on January 10, 2006.
- ENTACT responded to U.S. EPA's comments regarding the *Corrective Measures Implementation Workplan* on January 13, 2006 and March 8, 2006. The Workplan was revised based on U.S. EPA's comments and ENTACT's responses. The *Corrective Measures Implementation Workplan, Revision 1* was submitted to U.S. EPA for approval on March 8, 2006.
- Keystone submitted the *Corrective Measures Status Report No. 1 for the North Ditch Staging Area and F-Pond RCRA Corrective Measures as of February 14, 2006* on February 27, 2006, in accordance with U.S. EPA's February 16, 2006 letter request.
- Keystone submitted the *Corrective Measures Status Report No. 2 for the North Ditch Staging Area* on March 28, 2006.

Corrective Measures Activities Implemented During 1st Quarter 2006

- ENTACT implemented and completed the corrective measure for the North Ditch Staging Area in January and February 2006.

- ENTACT conducted the characterization sampling activities associated with the F-Pond on March 1 and 15, 2006 in preparation for the implementation of the corrective measures.
- ENTACT implemented the F-Pond corrective measure in March 2006. The following activities were conducted: clearing and grubbing of areas required for access and stabilization of wet, impacted sediment/soil in areas not exhibiting the toxicity characteristic for lead based on characterization sampling.

Corrective Measures Activities Scheduled for 2nd Quarter 2006

- ENTACT will complete the corrective measure at the F-Pond during the next quarter. Corrective measures activities that will be implemented and completed include: in-situ treatment of characteristically hazardous soil/sediment; characterization sampling of in-situ treated soil/sediment volumes for disposal purposes; excavation of in-situ treated soil/sediment; excavation of stabilized soil/sediment; post-excavation confirmation sampling of excavated surfaces; off-site transportation and disposal of excavated soil/sediment; and grading of excavated surfaces for drainage purposes.
- Keystone will implement the groundwater monitoring program associated with the North Ditch Staging Area and F-Pond.
- ENTACT will prepare the *Corrective Measures Completion Report* to summarize the corrective measures activities performed at the site.

Corrective Measures Project Schedule

- The corrective measures project schedule has been shifted due to inclement weather. However, it is anticipated that the corrective measures field activities will be completed by the end of April 2006.

CMI Workplan Modifications

- The corrective measures activities are being completed in accordance with the *Corrective Measures Implementation Workplan, Revision 1*.

Analytical Data

- Analytical data collected during the corrective measures will be submitted to U.S. EPA in the Corrective Measures Completion Report.
- Post-excavation sampling data collected from the North Ditch Staging Area in early February 2006 was used to determine if excavation activities were complete at this unit. The results indicated that lead concentrations in the post-excavation soil surface exceeded the remediation goals for the North Ditch Staging Area. For this reason, additional in-situ

Mr. Jonathan Adenuga
April 3, 2006
Page 3

treatment, excavation and post-excavation confirmation sampling were conducted in late February 2006. This second round of post-excavation confirmation sampling indicated that the remediation goals for the North Ditch Staging Area had been achieved.

- Characterization samples collected from the in-situ treated soil surface of the North Ditch Staging Area indicated that the soils would not be considered characteristically hazardous when generated. The soil was, therefore, disposed as non-hazardous special waste at a Subtitle D disposal facility.
- Characterization samples collected from the F-Pond indicated that the sediment/soil in several grids (approximately 30) had total lead or iron concentrations that exceeded the remediation goals for the F-Pond. The results also identified additional areas that could be considered characteristically hazardous for lead when generated.

Additionally during this quarter, ENTACT continued to implement the corrective action activities described in the IEPA-approved *Remedial Action Plan for the South Ditch, South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area* at the Keystone facility.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7165 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,



Chad Erdmann
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Russ Perry, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis

January 10, 2006

CERTIFIED MAIL #7003 0500 0001 6633 6709
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2005 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000.

During this quarter, Keystone conducted the following activities:

- The Corrective Measures Implementation (CMI) Workplan was submitted to U.S. EPA on November 8, 2005.
- ENTACT conducted the characterization sampling activities associated with the North Ditch Staging Area on November 22, 2005 in preparation for the implementation of the corrective measures. The corrective measures, however, were not implemented during this quarter.

Additionally during this quarter, ENTACT continued to implement the corrective action activities described in the IEPA-approved *Remedial Action Plan for the South Ditch, South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area* at the Keystone facility.

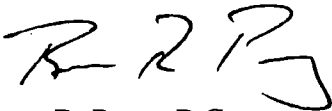
If you have any questions or comments, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Mr. Jonathan Adenuga

January 10, 2006

Page 2

Respectfully,

A handwritten signature in black ink, appearing to read 'R R Perry'.

Russ R. Perry, P.G.

Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA

Thad Slaughter, ENTACT Services LLC

Kevin Lombardozzi, on behalf of Keystone Consolidated Industries

Mark Hollingsworth, on behalf of Keystone Consolidated Industries

E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries

Jim Moore, Illinois Environmental Protection Agency

Andrew Running, Kirkland & Ellis

October 12, 2005

CERTIFIED MAIL #7003 0500 0001 6633 6419
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois
(EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on
Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2005 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000.

During this quarter, Keystone conducted the following activities:

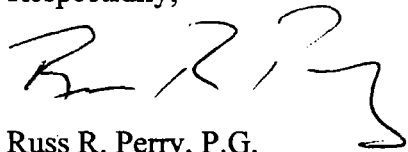
- Keystone received approval to conduct the F-Pond corrective measure from the Army Corps of Engineers (ACOE) under Nationwide Permit 38 on August 8, 2005 and the Illinois Department of Natural Resources under Permit No. DS2005075 on August 15, 2005. Based on the conditions provided in the ACOE approval, the Section 401 Water Quality Certification from the Illinois Environmental Protection Agency (IEPA) is waived if no comment has been received by October 7, 2005.

Additionally during this quarter, ENTACT continued to implement the corrective action activities described in the IEPA-approved *Remedial Action Plan for the South Ditch, South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area* at the Keystone facility.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Mr. Jonathan Adenuga
October 10, 2005
Page 2

Respectfully,

A handwritten signature in black ink, appearing to read "Russ R. Perry". The signature is stylized with a large, looped "R" and a long, sweeping underline.

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: George Hamper, U.S. EPA
Thad Slaughter, ENTACT Services LLC
Kevin Lombardozzi, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis

July 15, 2005

CERTIFIED MAIL #7003 0500 0001 6634 3219
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD000714881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending June 30, 2005, regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

During this quarter, Keystone conducted the following activities:

- Revision 1.0 of the Revised Final Corrective Measures Proposal was submitted to the U.S. EPA for review and approval on April 12, 2005. This revision addressed the comments of the U.S. EPA from their March 15, 2005 letter.
- Field reconnaissance of the F-Pond area was conducted on May 11, 2005 by Raisanen & Associates, Inc. to determine if the F-Pond could be considered a jurisdictional wetland. Raisanen & Associates, Inc. summarized their findings in the *Jurisdictional Wetland Determination/Delineation Report* dated May 19, 2005. This report was provided to ENTACT and Keystone for inclusion in the Nationwide Permit 38 application.
- The Joint Application Form for the Nationwide Permit 38 and the Section 401 Water Quality Certification were submitted to the Army Corps of Engineers, the Illinois Environmental Protection Agency and the Illinois Department of Natural Resources on July 7, 2005 for the review and approval of the proposed remedial activities associated with the jurisdictional wetlands of the F-Pond.

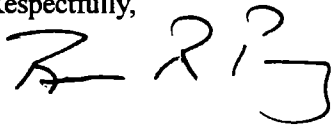
Additionally during this quarter, ENTACT prepared to mobilize to the Keystone facility to implement the corrective action activities described in the IEPA-approved *Remedial Action Plan for the South Ditch*,

Mr. Jonathan Adenuga
July 15, 2005
Page 2

South Borrow Area Waste Pile, Lower South Ditch, and Stained Soil Area. The corrective action activities are expected to begin in July 2005.

If you have any questions or comments, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Respectfully,

A handwritten signature in black ink, appearing to read 'R R Perry'.

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: George Hamper, USEPA
Thad Slaughter, ENTACT Services LLC
Kevin Lombardozzi, on behalf of Keystone Consolidated Industries
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries.
Jim Moore, Illinois Environmental Protection Agency
Andrew Running, Kirkland & Ellis



April 15, 2005

CERTIFIED MAIL # 7003 0500 0001 6634 2977
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000714881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2005, regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

During this quarter Keystone conducted the following activities:

- Keystone representatives and ENTACT held a meeting with Mr. Adenuga and Mr. Hamper in Chicago on January 4, 2005, it was determined that Keystone would revise the Final Corrective Measures Proposal and request a time extension for submittal of the document.
- The Revised Final Corrective Measures Proposal (CMP) was submitted to the USEPA on February 14, 2005. Comments concerning the CMP were received from the USEPA in a letter dated March 15, 2005.
- Revision 1.0 of the CMP was submitted to the USEPA on April 12, 2005. This revision addressed the comments of the USEPA from their March 15, 2005 letter.

If you have any questions, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Sincerely,
Keystone Steel & Wire Company

A handwritten signature in black ink, appearing to read "Russ R. Perry".

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Terry Casey, on behalf of Keystone Consolidated Industries
George Hamper, USEPA
Mark Hollingsworth, on behalf of Keystone Consolidated Industries
Kevin Lombardozi, on behalf of Keystone Consolidated Industries
E. Pierce Marshall, Jr., Acting Associate General Counsel of Keystone Consolidated Industries.
Jim Moore, IEPA
Andrew Running, Kirkland & Ellis
Thad Slaughter, ENTACT



January 12, 2005

CERTIFIED MAIL #7003 0500 0001 6634 2823
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA FacilityID Number: ILD 000714881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2004, regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

During this quarter Keystone conducted the following activities:

- Keystone submitted the Final Corrective Measures Proposal on December 17, 2004, in response to a Notice of Violation from the USEPA received on December 17, 2004. After discussions with Mr. Adenuga and Mr. Hamper in a meeting held in Chicago on January 4, 2005, it was determined that Keystone would revise the Final Corrective Measures Proposal and request a time extension for submittal of the document. This request is submitted herewith.
- On December 17, 2004, Keystone submitted to the IEPA a regulatory and remedial approach proposal to complete the remedial activities for closure of the identified solid waste management units in conjunction with the USEPA Corrective Action activities. Keystone has scheduled a formal meeting with the IEPA in late January 2005 to discuss these remedial options. Keystone plans to incorporate a regulatory approach for closure of the ditch units that is agreed to with the IEPA into the Final Corrective Measures Proposal to the USEPA for review and approval.
- Keystone submitted a reorganization plan to the U.S. Bankruptcy Court on October 4, 2004.

Keystone will be in contact with you in the near future to discuss our conceptual corrective measures for this site prior to its submittal. If you have any questions, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Sincerely,
Keystone Steel & Wire Company


Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Terry Casey, CONTRAN Corporation
George Hamper, USEPA
Mark Hollingsworth, Keystone Consolidated Industries
Jim Moore, IEPA
Andrew Running, Kirkland & Ellis
Thad Slaughter, ENTACT

Keystone Steel & Wire

October 15, 2004

CERTIFIED MAIL # 7001 1940 0006 0348 2731
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

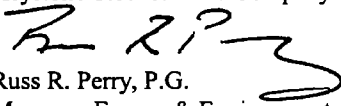
This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2004 regarding the requirements of the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (U.S. EPA) Region 5, dated December 20, 2000.

During this quarter Keystone conducted the following activities:

- Keystone solicited proposals from several consultants/contractors for technical and remedial services for remedial activities associated with the RCRA Units, the North Ditch Staging Area and the F-Pond. Based on the information in the proposals, Keystone has selected to work with ENTACT & Associates (ENTACT) located in Chicago, Illinois. ENTACT will be providing consulting and remedial services for this project. As part of the transition, RMT, Inc. will be finalizing the Remedial Corrective Measures Proposal.
- Keystone is currently evaluating regulatory and remedial approaches to complete the remedial activities for closure of the identified soil waste management units or areas of concern at the site. Keystone plans to schedule a formal meeting with the IEPA in mid to late November to discuss these remedial options. Once the remedial approaches for these units have been approved by IEPA, then Keystone will submit its Final Corrective Measures Proposal to the U.S. EPA for review and approval. It is important that we first obtain concurrence with the IEPA on a remedial action plan to be implemented because it will affect the outcome and remedial costs for the RCRA Units, the North Ditch Staging Area and the F-Pond.
- Keystone submitted a reorganization plan to the U.S. Bankruptcy Court on October 4, 2004.

Keystone and ENTACT will be arranging a meeting with you in the near future to discuss our corrective measures for this site. If you have any questions, please do not hesitate to contact me at (309) 697-7538 or Thad Slaughter of ENTACT at (972) 580-1323.

Sincerely,
Keystone Steel & Wire Company


Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.
Thad Slaughter, ENTACT

July 15, 2004

CERTIFIED MAIL # 7001 1940 0006 0348 0074
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated
December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending June 30, 2004 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

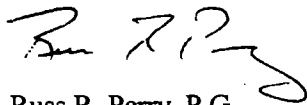
During this quarter, Keystone completed and submitted a technical letter (dated May 11, 2004) summarizing and documenting activities and results for the sampling event implemented at the former East Sludge Pond and the North and South Sludge Lagoons in December 2003. In its May 19, 2004 response, EPA agreed with the conclusions in that letter and requested that Keystone proceed with the preparation of a Final Corrective Measures Proposal for the outstanding units covered under the AOC.

Keystone requested an extension to the 30-day deadline proposed in the May 19 letter due our anticipated inability to meet it in light of our continued efforts to complete a financial reorganization plan after our February 2004 filing for voluntary Chapter 11 bankruptcy in U.S. Bankruptcy Court and the need to resolve technical issues related to the approach at the F-Pond due to its wetland classification status.

In our conference call on July 7, 2004, these issues were discussed and we agreed on a plan to move forward to complete the Final Corrective Measures Proposal for the F-Pond and North Ditch Treatment/Staging Area within two months (i.e., by September 7, 2004).

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



June 18, 2004

CERTIFIED MAIL # 7001 1940 0006 0348 0029
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: USEPA's May 19, 2004 Letter Regarding the Final Corrective Measures Proposal for
Keystone Steel & Wire Company, Peoria, Illinois
EPA Facility ID Number: ILD 000 714 881

Dear Mr. Adenuga:

Keystone Consolidated Industries, doing business as Keystone Steel & Wire Company (Keystone) has received and reviewed United States Environmental Protection Agency's (USEPA's) May 19, 2004 response letter regarding the 2003 sampling results for the East Sludge Pond and North and South Sludge Lagoons recently submitted by RMT, Inc. on behalf of Keystone. It is our understanding that USEPA has requested a detailed corrective action plan for the two areas where corrective action is required (i.e., the F-Pond and the former North Ditch Treatment/Staging Area). USEPA has requested that this plan be submitted within 30 days of Keystone's receipt of the May 19, 2004 letter, which we received on May 25, 2004.

The requested detailed corrective action plan is to include a statement of basis for public review and comment, suitable to explain the proposed remedy for the two units noted above plus all relevant completed and ongoing closure activities associated with the ditches per the Illinois Environmental Protection Agency (IEPA) Consent Order. Requirements for this statement of basis were detailed in USEPA's August 12, 2003 letter to Keystone. Based upon our understanding of these requirements, Keystone will be unable to meet the 30-day deadline indicated above (i.e., June 24, 2004), and therefore, requests an extension as discussed below.

Several conditions will preclude attainment of the June 24, 2004 deadline, primarily related to the establishment of a detailed corrective action plan and schedule suitable for public comment. First, the potential wetland status of the F-Pond must be determined to ensure that the final remedy proposed for public comment suitably addresses any special wetland area permitting, notification, or impact assessment requirements that may apply. Second, the recent bankruptcy filing by Keystone Consolidated Industries entails that the financial advisors to our creditors' committee as well as reorganizations professionals retained in management roles by the debtors need to be involved in the review and approval of major financial commitments, such as the remedial planning at issue. Third, the related remediation of the former K062 impoundments being performed under the IEPA RCRA Consent Order has been temporarily delayed, because of the need to negotiate with IEPA and the

Mr. Jonathan Adenuga
June 18, 2004
Page 2

Illinois Attorney General an agreement for the use in that closure work of the over \$5 million in the IEPA-controlled remediation trust account.

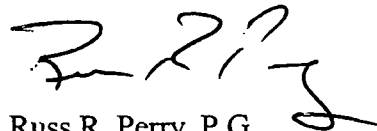
In light of these conditions, Keystone is in the process of re-evaluating the previously submitted Final Corrective Measures Proposal to fully address the potential application of wetlands regulations to the F-Pond area. Preparing a final detailed schedule for USEPA and public review is also not possible at this time, as such planning is, in part, contingent upon the securing of exit financing and on other aspects of the bankruptcy plan of reorganization.

Therefore, Keystone would like to request an extension to the 30-day deadline provided in the May 19, 2004 letter. It would likely be advantageous for us to hold a conference call to discuss the issues presented above, and establish a realistic timetable for their resolution and subsequent completion of the detailed final corrective measures proposal for public comment.

I will call you after you have had time to review this letter to discuss and set up a mutually agreeable time for the conference call. If you have any questions in the interim, please do not hesitate to contact me at (309) 697-7538.

Cell (309) 231-7859

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



April 15, 2004

CERTIFIED MAIL # 7002 0860 0003 4595 8593
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2004 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

During this quarter, Keystone filed for voluntary Chapter 11 bankruptcy reorganization in U.S. Bankruptcy Court. The initial bankruptcy petition was filed on February 26, 2004 with the Eastern District of Wisconsin Court in Milwaukee. Keystone has remained operational through the filing, as the Court reviews and implements the company's financial reorganization plan.

Sampling at the former East Sludge Pond in the Slag Processing Area and the North and South Sludge Lagoons was performed on December 3 and 4, 2003, per USEPA's August 12, 2003 letter. The focus on the company's bankruptcy filing and financial reorganization over the last two months has delayed completion of the summary documentation regarding this sampling event that is being compiled for USEPA's review. However, as noted in the last quarterly update, no hazardous characteristic results were observed in the sludge samples, and no elevated total lead results (none greater than 33 mg/kg) were observed in the additional samples collected in the former East Sludge Pond.

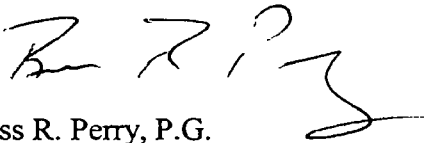
The results from the North and South Sludge Lagoons are consistent with data previously submitted to EPA as part of Keystone's petition for exclusion of this sludge as then-listed K063 hazardous waste. EPA approved this exclusion, and it was published in the Federal Register on August 6, 1981 (Vol 48, No. 151, pp 40157-40158). Keystone has not yet received word from the Agency regarding whether the results for the split samples retained from the North and South Sludge Lagoons by USEPA representatives in December 2003 yielded similar results.

Mr. Jonathan Adenuga
April 15, 2004
Page 2

Upon completion of the sampling report and data summary, Keystone will coordinate with USEPA to confirm where any additional corrective measures may be necessary and then finalize plans for those SWMUs where corrective action is required.

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company

A handwritten signature in black ink, appearing to read "Russ R. Perry", with a stylized flourish at the end.

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



January 15, 2004

CERTIFIED MAIL # 7001 1940 0006 0347 9450
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated
December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2003 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (USEPA) Region 5, dated December 20, 2000.

During this quarter, Keystone and USEPA coordinated efforts to complete characterization sampling in regard to the former East Sludge Pond in the Slag Processing Area and the North and South Sludge Lagoons as per USEPA's August 12, 2003 letter. Keystone and USEPA representatives collected and split samples from the sludge lagoons on December 3, 2003, and Keystone representatives collected samples from the former East Sludge Pond on December 4, 2003.

Keystone has received the final data reports from its analytical laboratory for the samples collected in December 2003, and is in the process of reviewing the data and preparing summary documentation for USEPA's review. A general review of the data collected indicates that no hazardous characteristic results were observed in the sludge samples, and no elevated total lead results (none greater than 33 mg/kg) were observed in the additional samples collected in the former East Sludge Pond. Upon completion of the data summary, Keystone will coordinate with USEPA to confirm where any additional corrective measures may be necessary and then finalize plans for those SWMUs where corrective action is required.

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company

A handwritten signature in black ink, appearing to read "R R Perry".

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D., L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.

Keystone Steel & Wire

April 15, 2003

CERTIFIED MAIL # 7001 1940 0006 0347 7838
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated
December 20, 2000

Dear Mr. Adenuga:

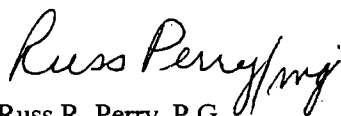
This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending March 31, 2003 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

During this quarter, Keystone completed and submitted a Final Corrective Measures Proposal as required by Paragraph 18 of the AOC and as per conditions in EPA's May 2, 2002 letter. This document summarized the final corrective measures that are currently being undertaken or are being proposed to mitigate existing and future exposure risks due to contaminated soil and groundwater remaining at the facility, as described in Keystone's facility-wide Environmental Indicators (EI) Assessment Report (approved by EPA on May 2, 2002).

Keystone is currently evaluating options and developing a response to EPA's March 28, 2003 letter outlining shortcomings in the Final Corrective Measures Proposal. Keystone intends to implement additional sampling in two areas as requested by EPA and will continue to work with the Agency to resolve these and the other issues raised in the March 28th letter, including revisions to the proposed corrective measures as appropriate.

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



January 13, 2003

CERTIFIED MAIL # 7001 0320 0001 8059 5654
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending December 31, 2002 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

Keystone completed sampling in early December 2002 to confirm and/or delineate elevated lead concentrations observed in historical soil samples collected from the former treatment/staging area adjacent to the North Ditch and from two locations in the Slag Processing Area. The sampling event was conducted in accordance with the sampling plan submitted to EPA on November 19, 2002. Keystone will utilize the analytical results for the samples in assessing final corrective measures for these areas.

Keystone is evaluating options and developing a final corrective measures plan to address soil and sediment at the facility that is contaminated at levels above EPA's Preliminary Remediation Goals (PRGs) and Illinois Environmental Protection Agency (IEPA) action levels. As described in Keystone's facility-wide Environmental Indicators (EI) Assessment Report (approved by EPA on May 2, 2002), human exposures and migration of contaminated groundwater are currently under control at the Peoria, Illinois facility. Keystone will complete and submit to EPA Region 5 proposed plans for the implementation of final corrective measures at the Peoria facility by January 30, 2003.

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company

A handwritten signature in black ink, appearing to read "Russ R. Perry".

Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten, Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.

Keystone Steel & Wire

October 9, 2002

CERTIFIED MAIL #7001 0320 0001 8059 5746
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company (Keystone) at its facility in Peoria, Illinois during the calendar quarter ending September 30, 2002 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

Since receiving EPA's approval (dated May 2, 2002) of the facility-wide Environmental Indicators (EI) determination that current human exposures and migration of contaminated groundwater are currently under control at the Peoria, Illinois facility; Keystone has continued to evaluate options for final corrective measures that will be necessary to address remaining soil and sediment at the facility that is contaminated at levels above EPA's Preliminary Remediation Goals (PRGs) and Illinois Environmental Protection Agency (IEPA) action levels. Current efforts are focused on collecting additional data to evaluate the current status of several areas where historical data (typically a single data point in each area) indicated corrective measures may be required.

Further investigation is being considered to confirm/delineate elevated lead concentrations observed in soil in the following areas: (1) the former treatment/staging area adjacent to the North Ditch, (2) the Slag Processing Area, and (3) the "East Sludge/Waste Pond." Keystone will coordinate with EPA in the fourth quarter of 2002 to implement this sampling and discuss its development of proposed plans for the implementation of final corrective measures at the facility that must be submitted to EPA Region 5 by January 30, 2003.

If you have any questions, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company


Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.

July 15, 2002

CERTIFIED MAIL #7001 0320 0001 8059 5906
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

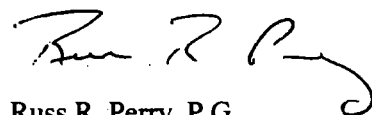
This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company at its facility in Peoria, Illinois (Keystone) during the calendar quarter ending June 30, 2002 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

Keystone submitted a draft *Environmental Indicators Assessment Report* to EPA Region 5 for review on January 29, 2002. On May 7, 2002, Keystone received EPA's approval (dated May 2, 2002) of the facility-wide Environmental Indicators (EI) determination that current human exposures and migration of contaminated groundwater are currently under control at the Peoria, Illinois facility. Keystone is now working on developing plans for the final corrective measures that will be necessary to address remaining soil and sediment at the facility that is contaminated at levels above EPA's Preliminary Remediation Goals (PRGs) and Illinois Environmental Protection Agency (IEPA) action levels.

Keystone expects to coordinate with EPA in the third quarter of 2002 to discuss its development of plans for the implementation of final corrective measures at the facility. The Consent Order requires that Keystone submit its proposal for final corrective measures to EPA Region 5 by January 30, 2003.

If you have any questions or need any additional information, please do not hesitate to contact me at (309) 697-7538

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



April 12, 2002

CERTIFIED MAIL #7000 0520 0017 7101 1590
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent
Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company at its facility in Peoria, Illinois (Keystone) during the calendar quarter ending March 31, 2002 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

During this quarter, Keystone completed its facility-wide draft Environmental Indicators (EI) determination. Keystone submitted an *Environmental Indicators Assessment Report* and a *Sampling Report for Environmental Indicators Assessment Investigation* on January 29, 2002 to EPA Region 5 for review. The *Environmental Indicators Assessment Report* included Keystone's draft EI forms and supporting documentation. In the report, Keystone established that human exposures to existing contamination (CA 725) and migration of contaminated groundwater (CA 750) are currently under control at its Peoria, Illinois facility.

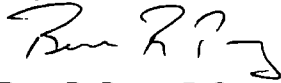
As per your requests, two sets of documents were forwarded to you during February 2002 to assist with your review of the *Environmental Indicators Assessment Report*. On February 15, 2002, Mark Prytula of RMT, Inc. emailed you electronic versions of forms CA 725 and CA 750 (hard copies of which were included as appendices to Keystone's draft EI assessment). On February 22, 2002, Robert Aten of Earth Tech forwarded to you copies of (1) the facility's most recent quarterly groundwater monitoring report, (2) an August 2000 groundwater management zone (GMZ) status report, and (3) the Illinois Environmental Protection Agency approval letter redefining the GMZ boundary in response to the August 2000 status report.

At this time, no other tasks have been scheduled or are being performed with regard to the AOC, as Keystone is awaiting your review comments regarding the draft EI determination. Keystone will continue to work with EPA in the second quarter of 2002 to provide any assistance, information, etc. that may be requested as the Agency conducts its review of the facility's draft EI determination and prepares its own evaluation.

Mr. Jonathan Adenuga
April 12, 2002
Page 2

If you have any questions or need any additional information please do not hesitate to contact me at
(309) 697-7538

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.



January 15, 2002

CERTIFIED MAIL #7000 0520 0017 7101 1514
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent
Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company at its facility in Peoria, Illinois (Keystone) during the calendar quarter ending December 31, 2001 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. Environmental Protection Agency (EPA) Region 5, dated December 20, 2000.

During this quarter, Keystone received and reviewed the analytical results from the sampling conducted at the Sheen Pond, F-Pond, East Pond, Tail Tracks Landfill, and Oil Skimmer Basin to evaluate whether these areas have been impacted by any hazardous constituents. After completing an initial assessment of the data, Keystone compiled and forwarded a short summary to you on November 28, 2001.

On November 30, 2001, representatives from Keystone, Earth Tech, RMT, Inc, and Kirkland & Ellis participated with you in a conference call. This call was arranged in order to satisfy the requirement for a semiannual meeting between the EPA and Keystone project managers as required by the AOC, and so that Keystone could discuss the status of the site investigations with you. In addition to the results of the recent sampling, the status of Keystone's exposure assessments, and progress in compiling the draft Environmental Indicators (EI) determination were also discussed.

After the discussion on November 30, Keystone also performed additional sampling in the area of the Tail Tracks Landfill. During the conference call you had expressed concern regarding the potential impact from hazardous constituents to surface water downstream in Mud Lake. During the sampling in September, groundwater samples from the new wells installed at the southern toe of the landfill cap were collected, but no surface water samples were taken since the shoreline of Mud Lake was well south of the toe of the landfill. Keystone procured three surface water samples from Mud Lake at the current shoreline in early December 2001. The analytical results for these samples have been received, and will be included in the EI Assessment Report (discussed below).

Mr. Jonathan Adenuga
January 15, 2002
Page 2

Keystone has completed its facility-wide draft EI determination, and is currently preparing the EI Assessment Report to meet the January 30, 2002 submission deadline. This report will include the sampling report for the new data collected in 2001, and justification for Keystone's EI determination.

At this time, no other tasks have been scheduled relating to the AOC, however, Keystone expects to be working with EPA in the first quarter of 2002 as it reviews Keystone's draft EI determination and prepares its own final evaluation.

Keystone estimates that through the fourth quarter of 2001, it has completed approximately 85% of the work that necessary to meet the January 30, 2002 deadline for submitting the facility-wide EI Assessment Report. Work to implement the tasks as required by the AOC will continue, and Keystone will update you on its progress in the next quarterly report. If you have any questions or need any additional information to set up a meeting, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.

Q:/epa/usepa/2000consentorder/4th Quarter 2001.doc



October 15, 2001

CERTIFIED MAIL #7000 0520 0017 7101 1613
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA
Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent
Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company at its facility in Peoria, Illinois (Keystone) during the calendar quarter ending September 30, 2001 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. EPA Region 5, dated December 20, 2000.

During this quarter, Keystone finalized sampling plans and protocols for the investigation of several units, and collected samples from these areas as required by the AOC. Sampling was conducted at the Sheen Pond, F-Pond, East Pond, Tail Tracks Landfill, and Oil Skimmer Basin to evaluate whether any impact by hazardous constituents are present. A copy of the sampling plan and parameter lists compiled for this investigation was forwarded to you on August 30, 2001. The sampling activities were implemented between September 17 and September 28, 2001.

Currently, Keystone is awaiting the analytical results for the collected samples to evaluate whether any impact by hazardous constituents has occurred and if any further sampling will be required. These assessments are intermediate steps Keystone must complete to meet the overall deadline of January 30, 2002 for submitting the facility-wide environmental indicators (EI) report for EPA review. A summary of the remaining intermediate tasks is presented in the following tentative schedule outline.

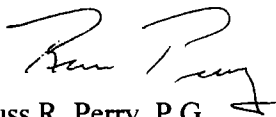
The anticipated schedule for work pertaining to the AOC in the remainder of 2001 is:

- (1) Review the current analytical data results and determine if additional sampling is necessary;
- (2) Procure additional samples, if necessary;
- (3) Submit a report(s) to U.S. EPA Region 5 summarizing the sampling results and describing any necessary containment or human exposure pathway exclusion measures in November; and
- (4) Implement any necessary containment/pathway exclusion measures to begin drafting the EI report by December.

Keystone estimates that through the third quarter of 2001, it has completed approximately 40% of the work that will be necessary during the calendar year to meet the January 30, 2002 deadline for submitting the facility-wide EI report. Work to implement the tasks discussed above will continue, and Keystone will present its progress in the next quarterly report, as required under the AOC.

Keystone is still awaiting a response from U.S. EPA regarding scheduling of the semiannual project status meeting required by the AOC. In the sampling notification letter submitted on August 30, 2001, Keystone suggested a conference call to discuss the sampling event and other issues relating to the Order. If you have any questions or need any additional information to set up a meeting, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Mark Hollingsworth, Keystone Consolidated Industries
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., RMT, Inc.

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July 13, 2001

CERTIFIED MAIL #7000 0520 0017 7101 5598
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company at its facility in Peoria, Illinois (Keystone) during the calendar quarter ending June 30, 2001 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. EPA Region 5, dated December 20, 2000.

During this quarter, Keystone continued its assessment of the historical site data and began generating sampling approaches (sample types, media, locations, etc.) for completing the investigations required by the AOC. For those areas requiring investigation, parameter lists were compiled (based upon the available historical sample data) and the development of sampling plans and protocols was initiated.

Preparation of these plans and for their implementation is proceeding so that the required sampling can be performed; this sampling being one of the intermediate tasks necessary to meet the overall deadline of January 30, 2002 for completing and submitting the facility-wide environmental indicators (EI) report for EPA review. A summary of these intermediate tasks is presented in the following tentative schedule outline.

The anticipated schedule for work pertaining to the AOC in the remainder of 2001 is:

- (1) complete the necessary sampling plan design and prepare for sampling implementation by the end of July;
- (2) collect samples, procure laboratory analysis, and review the analytical data through mid-summer;
- (3) submit a report(s) to U.S. EPA Region 5 summarizing the sampling results and describing any necessary containment or human exposure pathway exclusion measures by early October; and
- (4) implement any necessary containment/pathway exclusion measures in the fall to begin drafting the EI report by December.

Mr. Jonathan Adenuga

July 13, 2001

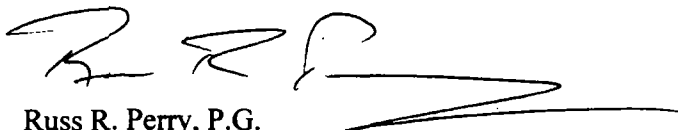
Page 2

Keystone estimates that through the second quarter of 2001, it has completed approximately 25% of the work that will be necessary during the calendar year to meet the January 30, 2002 deadline for submitting the facility-wide EI report. Work to implement the tasks discussed above will continue, and Keystone will present its progress in the next quarterly report and/or at the first semiannual meeting with the Agency (still to be scheduled), as required under the AOC.

If you have any questions or need any additional information, please do not hesitate to contact me at (309) 697-7538.

Sincerely,

Keystone Steel & Wire Company

A handwritten signature in black ink, appearing to read 'R R P', followed by a long horizontal line extending to the right.

Russ R. Perry, P.G.

Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., Lake Engineering

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April 12, 2001

CERTIFIED MAIL #7000 0520 0017 7096 5856
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (RE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Quarterly Progress Report for Keystone Steel & Wire Company, Peoria, Illinois (EPA Facility ID Number: ILD 000 714 881) as per the Administrative Order on Consent Dated December 20, 2000

Dear Mr. Adenuga:

This letter has been prepared to report the activities and progress made by Keystone Steel & Wire Company facility in Peoria, Illinois (Keystone) during the calendar quarter ending March 31, 2001 in regard to the Administrative Order on Consent (AOC) between Keystone and U.S. EPA Region 5, dated December 20, 2000. This is the first progress report prepared for the AOC, and includes the work performed since the effective date of the order (i.e., December 20, 2000 through March 31, 2001).

The primary task completed by Keystone during this quarter was the preparation of the Current Conditions Report (CCR) required by condition 15.a of the AOC, which was completed and submitted to U.S. EPA Region 5 for review on February 16, 2001. The CCR included a summary of the history, operations, and potential areas of concern at the facility, and described all of the corrective actions that have been undertaken on site since the 1989 RFA report was compiled. Recent sampling data collected at Keystone since the 1987 RFA Sampling Visit was also summarized and discussed.

Since submitting the CCR, Keystone has begun identifying the intermediate tasks that will need to be performed in order to meet the January 30, 2002 deadline for completing and submitting the facility-wide environmental indicators (EI) report. Preliminary development of plans and schedules for conducting area investigations, preparing reports, and implementing possible controls and/or pathway exclusion measures is currently underway.

At this time, the anticipated general schedule for the remainder of 2001 is:

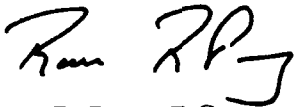
- (1) to conduct the necessary field investigative sampling by the end of July;
- (2) procure laboratory analysis for the samples and review the analytical data through mid-summer;
- (3) submit a report(s) to U.S. EPA Region 5 summarizing the sampling results and describing any necessary containment or human exposure pathway exclusion measures by early October; and

- (4) implement any necessary containment/pathway exclusion measures in the fall to begin drafting the EI report by December.

Keystone estimates that in the first quarter of 2001, it completed approximately 15% of the work that will be necessary during the calendar year to meet the January 30, 2002 deadline for submitting the facility-wide EI report. Work to implement the tasks discussed above will continue, and Keystone will present its progress in the next quarterly report and/or at the first semiannual meeting with the Agency (still to be scheduled), as required under the AOC.

If you have any questions or need any additional information, please do not hesitate to contact me at (309) 697-7538.

Sincerely,
Keystone Steel & Wire Company



Russ R. Perry, P.G.
Manager, Energy & Environmental Engineering

cc: Andrew Running, Kirkland & Ellis
Robert Aten Ph.D, L.P.G., Earth Tech
Jeffery Pierce, P.E., Lake Engineering

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